Anthony L. Hall, Esq., Nevada Bar No. 5977 Ricardo Cordova, Esq., Nevada Bar No. 11942 **HOLLAND & HART LLP** 5441 Kietzke Lane, Second Floor Reno, Nevada 89511 Tel: (775) 327-3000; Fax: (775) 786-6179 AHall@hollandhart.com RNCordova@hollandhart.com Attorneys for Premier Magnesia, LLC

THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

MELANIE HARMON, an individual,

Plaintiff.

VS.

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PREMIER MAGNESIA, a foreign limited-liability company; DOE BUSINESS ENTITIES 1-10; and DOE INDIVIDUALS 1-50.

Defendants.

Case No.: 3:17-cv-00743-MMD-WGC

JOINT STIPULATION TO PERMIT FILING OF SECOND AMENDED COMPLAINT TO OMIT DOE **DEFENDANTS**

Pursuant to Rule 15(a)(2), Plaintiff Melanie Harmon ("Harmon") and Defendant Premier Magnesia ("Premier"), by and through their counsel of record, stipulate and agree as follows:

Under Rule 15, a plaintiff may amend a pleading once as a matter of course within 21 days of serving it, or, if the pleading is one to which a responsive pleading is required, 21 days after service of a responsive pleading or 21 days after service of a motion under Rule 12(b), (e), or (f), whichever is earlier. In all other cases, a plaintiff may amend a pleading only with the opposing party's consent or with leave of the Court. The parties hereby stipulate and agree that Harmon may file a Second Amended Complaint for the sole purpose of omitting the "Doe Business Entities" and "Doe Individuals" that were included in her Amended Complaint. [See ECF No. 3]. Accordingly, Harmon will submit a Second Amended Complaint consistent with the foregoing within 14 days of the Court's approval of this stipulation. Premier will answer or otherwise ///